Deposition of Michael Carrick

Oregon Firearms Federation, Inc., et al. v. Kotek, et al. (Consolidated)

March 22, 2023



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Michael Carrick

	Page 1
IN THE UNITED DISTRICT COURT	
DISTRICT OF OREGON	
PENDLETON DIVISION	
OREGON FIREARMS FEDERATION,) No. 2:22-cv-018 INC., et al.,) 3:22-cv-018 Plaintiffs,) 3:22-cv-018 v.) TINA KOTEK, et al.,) Defendants.) and) OREGON ALLIANCE FOR GUN SAFETY,) Intervenor-Defendant.)	859-IM 862-IM
Caption continues)	
VIDEOTAPED VIDEOCONFERENCE DEPOSITION	
OF	
MICHAEL CARRICK	
9:03 a.m. (All participants appeared via videoconferer	nce.)
DATE TAKEN: MARCH 22, 2023 REPORTED BY: CRYSTAL R. McAULIFFE, RPR, CCR 212	21

Michael Carrick

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Page 2
     Caption continued...
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     MARK FITZ, et al.,
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           Plaintiffs,
3
      v.
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     ELLEN F. ROSENBLUM, et al.,
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           Defendants.
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     KATERINA B. EYRE, et al.,
8
           Plaintiffs,
9
      v.
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     ELLEN F. ROSENBLUM, et al.,
11
           Defendants.
12
     DANIEL AZZOPARDI, et al.,
13
           Plaintiffs,
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      v.
15
     ELLEN F. ROSENBLUM, et al.,
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           Defendants.
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Michael Carrick

	Page 3
1	APPEARANCES
2	
3	FOR PLAINTIFF OREGON FIREARMS FEDERATION, INC.:
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16	THE VIDEOGRAPHER: Coleman J. Andersen
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Michael Carrick

		Page 4
1	VIDEOCONFERENCE DEPOSITION OF MICHAEL CARRICK	
2	EXAMINATION INDEX	
3	MARCH 22, 2023	
4	EXAMINATION BY	PAGE
5	Mr. Jindal	6
6	Mr. Williamson	91
7	Mr. Jindal	95
8		
9		
10	EXHIBIT INDEX	
11	EXHIBITS FOR IDENTIFICATION	PAGE
12	55 Declaration of Michael Carrick	8
13	56 American Society of Arms Collectors website printout	83
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		

Michael Carrick

Page 10

America because I haven't looked into that.

- Q. When you say there were repeating rifles known in America in 1791, what do you mean by that?
 - A. I didn't say that they were known in America.

They were known to collectors back to the -- about the 1740s, there existed repeating rifles at least in England. As far as -- all I know about America is the one I'm familiar with as the Girardoni.

- Q. So the only repeating rifle that you know of being in existence in America, in say -- let's say, the 10-year period around 1791 is the single Girardoni rifle that we're here to discuss today?
- 13 A. Yes.

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- Q. Do you think that repeating guns were commonplace in America in 1791?
- 16 A. No.
- Q. Is it safe to say that most Americans wouldn't have ever seen a repeating gun in 1791?
- 19 A. That's correct.
- Q. And in your declaration on paragraph 18, on page 7, you describe Meriwether Lewis using the
- 22 Girardoni rifle to astonish Indians and conclude -- and
- 23 I'm just going to quote it here.
- 24 "Anyone in America in 1803 would be astonished
- to see a rifle that could fire 20 projectiles in

Michael Carrick

		Page 11		
1	one mir	nute without reloading."		
2		Why would a repeating rifle be astonishing to		
3	anyone	in America in 1803?		
4	Α.	Because there are very few people that know they		
5	exist.			
6	Q.	And do very few people know they exist in large		
7	part be	ecause they just aren't readily available in		
8	America	a at that time?		
9	А.	Due to the scarcity of it, I would say, yes,		
10	they we	ere not readily available.		
11	Q.	You said due to scarcity?		
12	А.	Yes. Due to the scarcity in the world.		
13	Q.	Understood.		
14		To the best of your knowledge, was the		
15	Girardo	oni-style air rifle sold commercially in America		
16	in 1791	in 1791?		
17	А.	It was not.		
18	Q.	Would it be fair to estimate not more than 10		
19	repeati	ing guns of thereabouts existed in America in		
20	1791?			
21	Α.	Well, I have no specific knowledge on that, but		
22	I would	d suspect you're correct.		
23	Q.	Yeah. Do you think that the number would be		
24	significantly lower than ten, maybe even single digits?			
25	А.	I don't know.		

	Page 99
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2	CERTIFICATE
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5	STATE OF WASHINGTON)) ss.
6	COUNTY OF KITSAP)
7	
8	I, CRYSTAL R. McAULIFFE, a Certified Court
9	Reporter in and for the State of Washington, do hereby
10	certify that the foregoing transcript of the
11	videoconference deposition of MICHAEL CARRICK, having
12	been duly sworn on MARCH 22, 2023, is true and accurate
13	to the best of my knowledge, skill and ability.
14	Reading and signing was not requested pursuant
15	to FRCP Rule 30(e).
16	IN WITNESS WHEREOF, I have hereunto set my hand
17	and seal this 3rd day of April, 2023.
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19	Cuptal maubble
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21	CRYSTAL R. McAULIFFE, RPR, CCR #2121
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